

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

JURY DEMAND

**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL DOCUMENTS WITHHELD BY DEFENDANTS
CHARLESBANK CAPITAL PARTNERS LLC AND BAIN CAPITAL PRIVATE
EQUITY**

Plaintiffs Jessica Jones and Christina Lorenzen (Plaintiffs”), by and through their undersigned counsel, hereby file this Motion for Leave to File Reply (“Motion”) in Support of their Motion to Compel Documents Withheld by Defendants’ Charlesbank and Bain (“Underlying Motion”), pursuant to Local Rule 7.2(c). Plaintiffs filed the Underlying Motion on May 2, 2022. ECF No. 290. Defendants responded in opposition on May 16, 2022 (“Opposition”). ECF No. 297.

Plaintiffs respectfully request an opportunity to reply for the following reasons. First, Defendants Charlesbank and Bain’s assertions in their Opposition raise new issues they did not raise previously when the parties met and conferred to attempt to resolve this dispute. Plaintiffs would like an opportunity to reply. Second, Defendants make several incorrect assertions of fact that must be corrected to make the record clear. Plaintiffs would like to be able to correct

Defendants' attempts to confuse the record. Third, one of Defendants' main arguments in Opposition is to argue that Plaintiffs violated the Protective Order in the same manner as Defendants. Putting aside the fact that Plaintiffs' privilege log is not subject to a motion, Plaintiffs' and Defendants' conduct with respect to the privilege logs is by no means comparable. Plaintiffs should be able to respond to Defendants' accusations lodged for the first time in their Opposition.

To make the record clear, the assertions in Charlesbank and Bains's Opposition warrant a response. For that reason, Plaintiffs seek leave to file a reply brief, in compliance with Local Rule 7.2(c), by May 20, 2022.

Dated: May 17, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri

Joseph R. Saveri*
Steven N. Williams*
Ronnie Seidel Spiegel*+
Kevin E. Rayhill*
Elissa A. Buchanan*
David Seidel*
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1000
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com
swilliams@saverilawfirm.com
rspiegel@saverilawfirm.com
krayhill@saverilawfirm.com
eabuchanan@saverilawfirm.com
dseidel@saverilawfirm.com

Van Turner (TN Bar No. 22603)
BRUCE TURNER, PLLC
2650 Thousand Oaks Blvd., Suite 2325
Memphis, Tennessee 38118
Telephone: (901) 290-6610
Facsimile: (901) 290-6611
vturner@bruceturnerlaw.net

Richard M. Paul III*
Sean R. Cooper*
Ashlea Schwarz*
PAUL LLP
601 Walnut, Suite 300
Kansas City, Missouri 64106
Telephone: (816) 984-8100
rick@paulllp.com
sean@paulllp.com
ashlea@paulllp.com

Jason S. Hartley*
Fatima Brizuela*
HARTLEY LLP
101 West Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
hartley@hartleyllp.com
brizuela@hartleyllp.com

Daniel E. Gustafson*
Daniel C. Hedlund*
Daniel J. Nordin*
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dnordin@gustafsongluek.com

* Admitted pro hac vice

+Located in Washington State

*Attorneys for Individual and
Representative Plaintiffs*

CERTIFICATE OF CONSULTATION

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on May 16, 2022, counsel at my firm emailed counsel for Defendants advising them that Plaintiffs intended to file a motion seeking the relief set out above. Plaintiffs have not received a response to that email.

/s/ Joseph R. Saveri

Joseph R. Saveri

CERTIFICATE OF SERVICE

I hereby certify that on May 17, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri

Joseph R. Saveri